

**ORIGINAL**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FILED  
MAR 10 2006  
CLERK, U.S. DISTRICT COURT  
By [Signature] Deputy**

MICHAEL J. QUILLING, RECEIVER  
FOR SARDAUKAR HOLDINGS, IBC and  
BRADLEY C. STARK,

PLAINTIFF,

3-D MARKETING, LLC,

(aggrieved) DEFENDANT.

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§ CIVIL ACTION NO.306CV0293-P  
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§ REBUTTAL (BY SPECIAL  
§ APPEARANCE) TO:  
§ 1. PURPORTED COMPLAINT  
§ 2. PURPORTED JURISDICTIONS  
§ 3. PURPORTED ENTITLEMENT  
§ OF JUSTICE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Dean Allen Steeves, by and on behalf of 3-D MARKETING, LLC, the (aggrieved) defendant, a Nevada Limited Liability Company; herein, to rebut the purported "complaint" filed by the Plaintiff, "MICHAEL J. QUILLING, (ESQ.), RECEIVER", by pointing out blatant errors in the PLAINTIFF'S premise and basis for the action and to preserve the right to challenge jurisdiction.

**GENERAL FACTS**

1. 3-D MARKETING, LLC, denies any and all allegations of any wrong doing or offense to the law relative to the alleged involvement with any of the DEFENDANTS (SARDAUKAR HOLDINGS, BRADLEY STARK, STANLEY LEITNER, MEGAFUND, CIG LTD, JAMES RUMPF, CILAK

INTERNATIONAL or PAMELA STARK) as mentioned in the case to which M.J. QUILLING, Esq. was allegedly appointed "RECEIVER".

2. 3-D MARKETING, LLC, made two payments totaling \$100,000 to SARDAUKAR HOLDINGS, IBC (heretofore, "SARDAUKAR") as an investor only. There is no elaborate fraudulent transfer of funds involved as is implied in writing, but unsubstantiated, in the purported "complaint", by the RECEIVER, under COUNT TWO.
3. The first investment payment from 3-D MARKETING, LLC, to SARDAUKAR was made on August 27<sup>th</sup> 2004, in the amount of \$50,000 USD in the form of a CASHIER'S CHECK. The second investment payment from 3-D MARKETING, LLC, was made on February 8, 2005, via company check for \$50,000 USD. 3-D MARKETING, LLC, clearly exchanged benefit for claim to SARDAUKAR assets in the form of investment, and in the amount of One Hundred Thousand USD sum total, contrary to RECEIVER'S written claim in item #9 of his purported "complaint".
4. RECEIVER writes that two payments were "diverted" to 3-D MARKETING, LLC, from SARDAUKAR on or about March 11, 2005 and April 7, 2005 and that there was not an exchanged benefit for such receipt. It is clear from item #3 that there was a lawful basis (exchanged benefit in the tendering of USD as an investment) for expectation of return of funds/profit from SARDAUKAR.
5. The first return/distribution to 3-D MARKETING, LLC, on invested funds was made as a "request for distribution" by 3-D MARKETING,

LLC, from the 3-D MARKETING, LLC investment account at SARDAUKAR, on or about the March 11<sup>th</sup> date specified by the purported RECEIVER. But, aforementioned and requested distribution of \$75,000 USD was received by 3-D MARKETING, LLC, on March 11, 2005 in the normal sequence of business, i.e., .....demand funds from investment account,.....receive funds from investment account. There is no violation of the law there or anywhere in this relationship as an investor or any other by 3-D MARKETING, LLC. For the purported RECEIVER to imply otherwise and to file an unsupportable unverified complaint/lawsuit and a request for Jury Trial is a useless waste of taxpayer and investor resources and an affront and harm on the good name of 3-D MARKETING, LLC.

6. The second return/distribution of \$75,000 USD made to 3-D MARKETING, LLC, on April 7, 2005, from SARDAUKAR was ordered from another SARDAUKAR investor, L.B. Private Charitable Trust. See the attached Affidavit of Truth from Bradley Christopher Stark that the second wire of \$75,000 USD on April 7, 2005, was sourced from the investment account of L.B. Private Charitable Trust and that the Trust had; therefore, has exchanged and/or tendered benefit for claim to SARDAUKAR assets, not exceeding its investment in same. This was another simple and legitimate business transaction, nothing complex, fraudulent or sinister as MR. QUILLING would have one believe. That clarifies the incident of two bank wires of the same amount coming from two separate investment accounts at SARDAUKAR.

7. 3-D MARKETING, LLC, still falls short of its invested principal sum of \$100,000 in payback/return/distribution from SARDAUKAR and has clearly exchanged and tendered benefit for claim to SARDAUKAR assets, contrary to PURPORTED RECEIVER'S claim in item #9 of his purported "complaint".

**IN SUMMARY**

Showing the PURPORTED RECEIVER'S claims and accusations wanting, and showing the absence of proof of wrong doing or offense to the law, I Dean Allen Steeves, on behalf of 3-D MARKETING, LLC, would like to see all fraudulent matter abated with prejudice, if such exist(s) in the instant case, and would like to see a bar against any further harassment and malicious prosecution of SARDAUKAR investors in the nature of a "fishing expedition" especially under the guise of "a quasi law and equity" unverified complaint, simultaneously.

If all conclusions are **stripped** from the purported RECEIVER'S complaint, no facts remain which constitute an offense whether at Law or in equity. The (aggrieved) defendant suggests that judicial notice should be taken of the history of mixing conclusion with fact without delineating what is conclusion, and what is fact (See attached Affidavit of Truth of Bradley Christopher Stark herewith).



Dean Allen Steeves, Manager  
for 3-D MARKETING, LLC.

Mail to:  
P.O. BOX 45  
RANCHO SANTA FE, CA 92067-0045

## Declaration of Facts of Dean Allen Steeves

I, Dean Allen Steeves, declare as follows:

1. 3-D MARKETING, LLC, is named as a "defendant" in the above entitled matter.
2. I have read the foregoing;

REBUTTAL (BY SPECIAL APPEARANCE) TO:

1. PURPORTED COMPLAINT
2. PURPORTED JURISDICTIONS
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and believe the facts written; hereupon, to be true and complete.

I declare, under the penalty of perjury, that the foregoing is true and complete.

Sealed this date: 03-08-06 at Rancho Santa Fe, California.



Dean Allen Steeves

## Affidavit of Truth of Bradley Christopher Stark

I, Bradley Christopher Stark, an implied PLAINTIFF-defendant in the footer-entitled action, do state as follows:

1. That the second bank wire of \$75,000 to 3-D MARKETING, LLC, on March 11, 2005, was sourced from the investment account of L.B. Private Charitable Trust at SARDAUKAR HOLDINGS, IBC, CHASE BANK in New York;
2. That said Trust through clearly documented intent, has exchanged and/or tendered benefit as investment for claim to SARDAUKAR assets;
3. That the amount distributed from SARDAUKAR on behalf of the Trust has not exceeded its investment (which can simply be verified by examining the computer and records that were taken from me, in my home, by one M.J. QUILLING, ESQ., RECEIVER;
4. I have not now, nor have I ever been involved in any Ponzi Scheme or other types of unlawful acts as alleged by M. J. QUILLING, Esq.;
5. M. J. QUILLING, under the presumed authority of the SEC, has ostensibly, fraudulently seized private funds, from private accounts, preventing me from fulfilling my contractual obligations to all my/SARDAUKAR'S investors;
6. M.J. QUILLING, under the presumed authority of the SEC and without conclusive evidence or probable cause has seized and converted my private and business property preventing me from fulfilling my contractual obligations to all my/SARDAUKAR'S investors including, but not limited to 3-D MARKETING, LLC and L.B. Private Charitable Trust.

I, Bradley Christopher Stark, do affirm under seal, pursuant to the penalty of perjury of the laws of The United States of America that the forgoing is true and complete to the best of my knowledge and belief.

Seal \_\_\_\_\_

  
Bradley Christopher Stark

Date: March 09, 2006

**PROOF OF SERVICE BY MAIL**

I hereby certify that on this 9<sup>th</sup> day of March, 2006, that a copy of the document mentioned in the footer hereto, was sent First Class US Mail, prepaid to the following:

MICHAEL J. QUILLING, ESQ., RECEIVER AND BRENT J. RODINE  
2001 BRYAN STREET, SUITE 1800  
DALLAS, TEXAS 75201-4240

I so certify by my seal below:

Seal Dean Allen Steeves Date: 3/9/06  
Dean Allen Steeves

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